

REMARKS/ARGUMENTS

Reconsideration of this application is respectfully requested.'

In response to the drawing objection under 37 CFR §1.83(a) suitable changes have been made to the specification at page 4 and the drawings at Fig. 7. The description in the specification (e.g., see pages 4, 12-13, etc.) makes it clear that the Indoor Data Adaptor (IDA) (120) in Fig. 7 includes the analog converter and packet switcher elements. These have now been shown explicitly as separate boxes 120a and 120b inside the larger IDA 120 box already present in Fig. 7. Accordingly, no new matter is presented.

The rejection of claims 1-5 under 35 USC §103 as allegedly being made "obvious" based on Leuca '593 in view of Regnier '047 is respectfully traversed.

Claims 1 and 5 have been amended to specify "each wireless subscriber unit comprising at least one interface to a plurality of hosts including at least one telephone host and at least one other non-telephone host".

The Examiner contends that Leuca discloses all of the features of claim 1 except the feature whereby both an analog converter and a packet switcher are provided in each wireless subscriber unit. In fact, Leuca does not disclose any of the following features of claim 1:

(i) "each wireless subscriber unit comprises at least one interface to a plurality of hosts including at least one telephone host and at least one other non-telephone host".

The Examiner contends that the Remote Unit 120 of Leuca is a counterpart of the wireless subscriber unit of claim 1. However, as is clear from Figure 1 of Leuca, the Remote Unit 120 has an interface only to a single host (wireless telephone 40). Similarly, Remote unit 80 of Leuca has an interface to a single telephone host (wireless

telephone 30). Leuca neither discloses nor suggests that a remote unit has an interface to a non-telephone host.

(ii) each wireless subscriber unit has "a packet switcher operable to perform packet switching of IP packets arriving at the base station and to perform routing of IP packets to the telephone host and to the hosts other than the telephone host".

By way of contrast, Leuca discloses that packet switching is performed by the gateway unit 130 and not by the Remote Unit 120 (which Examiner contends is a counterpart of the wireless subscriber unit of claim 1).

(iii) each wireless subscriber unit has "an analog converter operative to . . . receive incoming analog voice information from the telephone host, to translate said incoming analog voice information into IP packet formatted information and to feed the IP packet formatted information to the base station".

The Examiner makes reference to Leuca page 3 paragraph [0038], which discloses that Remote Unit 80 comprises an A/D converter "to perform conversion of analog speech signals to digitally sampled speech signals". However, Leuca neither discloses nor suggests that the A/D converter of the remote Unit 80 is operable to translate incoming analog voice information to IP packet formatted information, as required by claims 1 and 5. Indeed, Leuca teaches away from (see paragraph [0048]) this feature by teaching that the base station (rather than the Remote Unit) packages the voice information.

(iv) a gateway unit operative to "translate incoming voice packets from I packet format into analog voice representation".

The gateway unit 130 of Leuca determines routing path (see paragraph [0032]) but does not perform any translation of incoming IP voice packets into an analog voice representation. Leuca teaches away from using the gateway unit to perform D/A conversion by teaching that D/A conversion is performed by the remote unit 120.

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It can be seen by comparison of Leuca's Figure 1 with applicant's Figure 1 that the network system of Leuca is fundamentally different from the applicant's invention. In particular, each of the wireless subscriber units (EPUs 60) of the present invention are operable to communicate wirelessly with the gateway 30 and each EPU 60 is capable of communicating with a plurality of hosts including a telephone host and other hosts such as a computer terminal. By way of contrast, Leuca teaches that each wireless telephone 30, 40 has its own dedicated base station 70, 110. In Leuca, communication between the wireless telephone 30 and the wireless telephone 40 necessarily requires a communication chain that involves two separate base stations 70 and 110.

The applicant's invention represents a more elegant and efficient solution to the problem of enabling wireless access to services of both an analog voice network and a data network since it enables a single EPU (wireless subscriber unit) that provides an interface to a plurality of different host devices to be located in an office or home environment. The gateway unit is operative to mediate communication by both switching incoming data packets onto the data network and by translating incoming voice packets into an analog voice representation.

By way of contrast, in Leuca, the packetizing and depacketizing is performed by individual base stations 70 and 110 and a base station must be provided for each host device. No facility for packaging incoming analog voice information is provided in the wireless subscriber units (remote units of Leuca).

The present invention has the technical advantage, with regard to the system of Leuca, that at each communication node (wireless subscriber unit/EPU) a plurality of host devices can communicate in a coordinated manner using a single base station. Provision of both the analog converter and the packet switcher in the wireless subscriber unit simplifies the routing of communications relative to the system of Leuca.

The Examiner also erroneously contends that Regnier discloses all of the features of claim 1 of the present invention that are absent from Leuca.

Regnier discloses a system for simultaneously sending IP packets representing a telephone call and IP packets from a computer along a single subscriber telephone line. The system comprises a converter 230 for converting signals from a telephone terminal into IP packets and a multiplexer 200 for simultaneously sending IP packets representing the telephone call and IP packets from the computer along the subscriber line.

The Examiner contends that since paragraph 23, lines 26-35 of Regnier discloses that both the internal line and the subscriber line of the system of Regnier could be wireless, it would be obvious to the skilled person to incorporate the analog converter 230 and the multiplexer 200 into the system of Leuca to arrive at a system according to applicant's claim 1. However, contrary to such assertions, the skilled person would not automatically consider incorporating the multiplexer 200 and converter 230 of Regnier into the remote unit 120 (alleged counterpart of wireless subscriber unit of claim 1) of Leuca.

There is a clear disincentive for the skilled person to incorporate the multiplexer 200 and the converter 230 of Regnier into the remote unit of Leuca since he would realize that the routing of data performed by the gateway 130 together with the base stations 110 and 70 of Leuca is incompatible with the functions performed by the multiplexer 200 and the converter 230 of Regnier. In particular, the base stations 110 and 70 of Leuca already perform packetizing of incoming voice information (a function performed by the converter 230 of Regnier). Furthermore, the gateway unit 130 of Leuca is responsible for routing of communications, so to incorporate the multiplexer 200 in the Remote Unit of Leuca would present difficulties in routing of individual data and voice communications.

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Regnier also neither discloses nor suggests a gateway unit operative to translate incoming voice packets from IP packet format into analog voice representation.

Accordingly, even if the skilled person were to combine Leuca and Regnier (which it is considered that he would have no motivation to do) he would still not arrive at the invention according to claim 1.

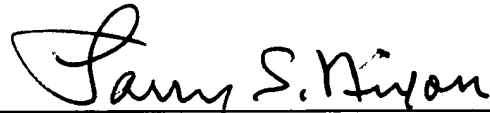
In view of the fundamental deficiencies of both references with respect to even the independent claims, it is not believed necessary to describe the further deficiencies with respect to dependent claims.

This entire application is now believed to be in allowable condition and a formal notice to that effect is respectfully solicited.

Respectfully submitted,

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IN THE DRAWINGS:

Attached sheet of drawings include an annotated mark-up sheet showing requested changes for Figure 7 and a replacement sheet incorporating such changes.

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ANNOTATED MARKED UP DRAWINGS
FOR SN 09/857,497

FIG. 7

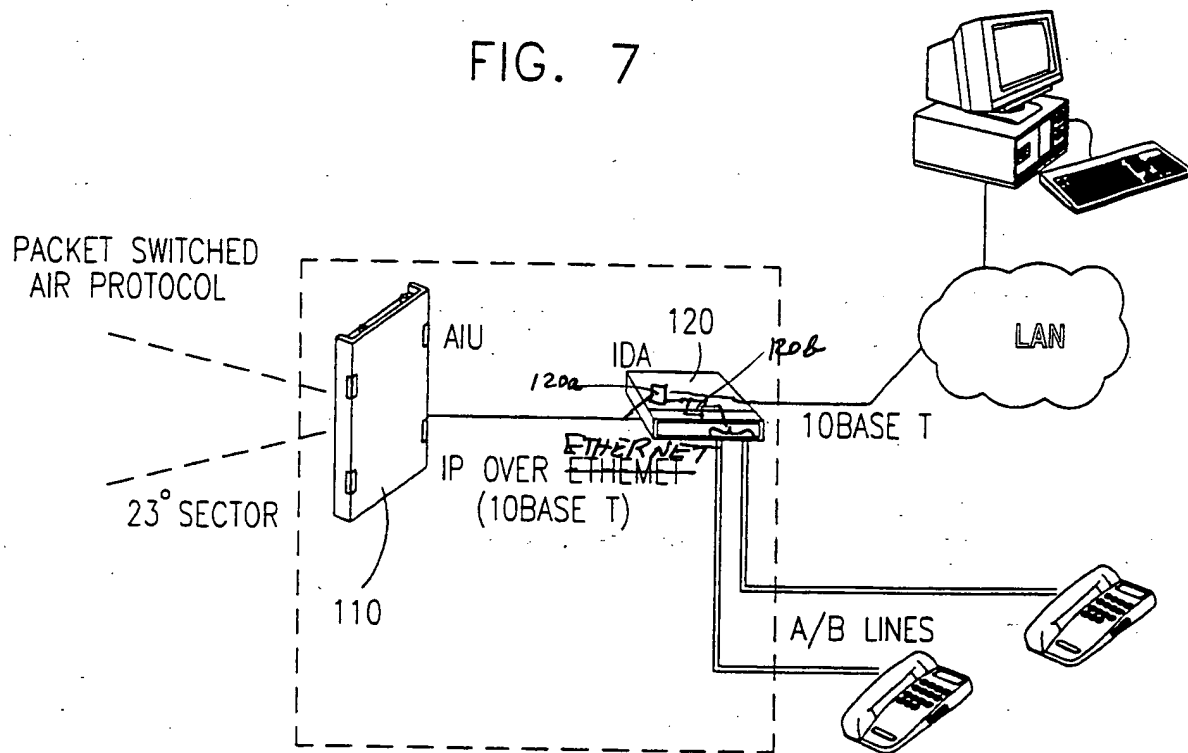


FIG. 8

